Comment from: David J Porcher-KF5PMY 1605 Crow Creek Drive Granbury, Texas, 76049

DOCKET NUMBER: RM-11828

Date: March 17, 2019

COMMENT REGARDING RM-11828 AS PROPOSED BY THE AMERICAN RADIO RELAY LEAGUE

Thank you for allowing me to voice my OBJECTION to this proposed rulemaking request, RM-11828, filed by Chris Imlay on behalf of the "American Radio Relay League" (ARRL)

I am an Amateur Extra Class license holder and am a member of RACES and ARES groups in two county's in Texas. I am also a County Liaison Officer of one county and a County Liaison Officer Alternate in another County for Texas State RACES. I use WINLINK and Pactor and other modes The FCC allows in my license class. I am a volunteer examiner and we have monthly testing available in our County. I am normally supportive of the ARRL, but I disagree with them on RM-11828. I have been a volunteer examiner since receiving my Extra Class License in 2013, my observations of newly licensed Technicians, they are eager to learn but are timid and need some guidance to get on the air. They make mistakes as I did as a technician. RM-11828 grants tech 50% of the total General VOICE allocation. RM-11828 and RM-11759 seek to grant technicians data privileges taken from the bottom 50KHz of the current 80 Meter Extra Class phone band.

My personal feelings are that a licensed technician is an apprentice and needs on the job training and testing before venturing into more sophisticated areas of communication. The General license examination is harder than the technician examination for a reason The Extra Class examination is harder than the General examination for a reason. Thank you for your time and consideration,

David J Porcher-KF5PMY